

FILED

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Alexandria Division

2017 FEB -6 P 2:38

CLERK U.S. DISTRICT COURT
ALEXANDRIA, VIRGINIA

PAUL A. BOYNE

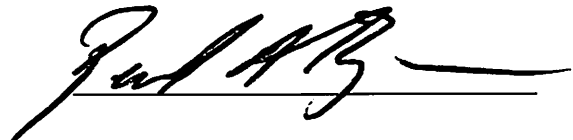
Case No. 1:17SW14 Under Seal

v.

UNITED STATES OF AMERICA

BRIEF IN SUPPORT OF MOTION TO RETURN PROPERTY

The government has demonstrated no necessity of criminal investigation to hold computer hardware or even a paper notebook to affect its investigation. The government has the means and did make copies of certain electronic devices during its execution of its search warrant. The purpose of taking two laptop computers, seven flash drives, three camera cards, an external hard drive and one paper notebook is merely designed to harass. The government made four images of other phones, ipads, desktop and another laptop without seizure. As the search and seizure party went on for over six hours and did not extend beyond the normal federal workday, there was ample time to make copies of even the paper notebook. There is no substantive or compelling reason to deprive the undersigned of property. The undersigned relies on common sense, due process and protections afforded by the First and Fourth Amendments to ask for the return of his property.



Paul A. Boyne, Pro Se

CERTIFICATION

I declare under penalty of perjury that:

No attorney has prepared, or assisted in the preparation of this document.

PAUL A. BOYNE

Name of Pro Se Party (~~Print~~ or Type)



Signature of Pro Se Party

Executed on: 5 February 2017 (Date)

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